

From: Mastro, Donna
Sent: Monday, June 09, 2014 11:14 AM
To: Thomas.Huynh@phila.gov; Edward Wiener; Velez-Rosa, Emlyn; Vyas, Himanshu; Fernandez, Cristina
Cc: kassahun.sellassie@phila.gov; Biji Pandisseril; Rahel Gebrekidan; Noelle Helmstetter; Henry Kim
Subject: RE: Meeting

Tom- EPA did not SIP approve that provision saying prior BACT or LAER is RACT. Therefore, AMS needs to explain for 1997 RACT that existing controls remain RACT and no other more stringent controls exist or are cost-effective. It is possible that the units still have the most cost-effective controls and emissions rates. However, that needs an explanation.

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From: Thomas Huynh [mailto:Thomas.Huynh@phila.gov]
Sent: Monday, June 09, 2014 11:08 AM
To: Edward Wiener; Velez-Rosa, Emlyn; Mastro, Donna; Vyas, Himanshu; Fernandez, Cristina
Cc: kassahun.sellassie@phila.gov; Biji Pandisseril; Rahel Gebrekidan; Noelle Helmstetter; Henry Kim
Subject: RE: Meeting

Ed
I remember that the Temple gas generators are considered meeting BACT at the time and fall under presumptive RACT.
Why we have to resubmitted case by case for these units?
Thanks

From: Edward Wiener
Sent: Monday, June 09, 2014 10:48 AM
To: Velez-Rosa.Emlyn@epa.gov; Mastro, Donna; Vyas, Himanshu; Fernandez, Cristina
Cc: Kassahun Sellassie; Biji Pandisseril; Rahel Gebrekidan; Noelle Helmstetter; Henry Kim; Thomas Huynh
Subject: Meeting

Tom Huynh wanted me to e-mail a summary of the meeting. Please let us know if you disagree with something.

Deadlines:

We want to get the EGUs done by Wednesday June 11, including the SIP package. If everything is in order, we will send these through the process in advance of the other facilities.

I will get Emlyn the PES memo by June 11.

June 30 is our target for the public notice for the remaining facilities. We want to get the details done by June 25.

Tom mentioned that the original RACT commitment in the 105 must be modified.

Facilities Covered:

We discussed about four (4) facilities: Mondelez, Kinder Morgan, Temple Health Science,

& Temple Main which needed further discussion to solve the problems.

1. Mondelez (formerly Nabisco): The original issue was demonstrating that adding 20 ppm outlet doesn't relax RACT. Cristina mentioned that it would be better not to discuss about RACT modification about this facility since they are shutting down.

2. Kinder Morgan: Cristina explained about how to deal with this problem with this facility. All sources are covered by Presumptive RACT/CTG RACT regulation but some had additional 1 hr RACT limits, such as combined VOC limits for uncontrolled RACT. EPA clarified how to address this in the memo. Update:

Noelle sent a revised memo on Friday.

3. Temple Health Science: This issue was that the three boilers each 76.4 MMBTU/hr have a combined NOx emissions. RACT determination should be unit-by-unit, but instead all three boilers have a combined emission limitations. Now EPA agrees to take the combined emissions to analyze the effect of the RACT modification. Update: It appears we misunderstood this one. Emlyn e-mailed today that she wanted to include calculations for the individual boilers.

4. Temple Main: The issue was that original RACT was not sipped for some reason. We now need to treat this as an initial RACT. Emission limits for 10 generators established in an installation permit before RACT that can be used for the baseline. Also we need to determine baseline emissions for generators since limits are for combined units.

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